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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PAUL A. REDD, JR.,

Plaintiff,

vs.

MICHAEL D. DALEY,

Defendant.

No. C 98-20429 EMC

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE DISCOVERY  
CUT OFF DATES**

**JOINT STIPULATION**

Pursuant to Local Rule 6-2, Plaintiff Paul A. Redd, Jr. and Defendant Michael D. Daley, by and through their respective counsel of record, hereby jointly stipulate and respectfully request the Court enter an order as follows:

1. On October 20, 2014, the Court issued its Case Management and Pretrial Order for Jury Trial (ECF 234). In the Order, the Court set the following discovery deadlines:

- Non-expert discovery cut off: December 4, 2014
- Opening expert reports: December 4, 2014
- Rebuttal expert reports: December 26, 2014
- Expert discovery cut off: January 15, 2015

2. Since the Court's order, the parties have engaged in discussions regarding settlement of Plaintiff's claims and scheduling discovery so as not to prejudice their direct settlement discussions.

3. Accordingly, in order for the parties to explore fully the possibility of settlement of this action, the parties' respectfully request that the Court continue the discovery deadlines as follows:

- Non-expert discovery cut off: February 2, 2015
- Opening expert reports: February 2, 2015
- Rebuttal expert reports: February 23, 2015
- Expert discovery cut off: March 9, 2015

4. The filing of this stipulation does not affect the other case management deadline set by the Court in the October 20, 2014, Order, including the trial and pre-trial dates.

Dated: November 24, 2014

RISHI N. SHARMA  
PETER A. COOPER  
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By: s/ Peter A. Cooper  
Peter A. Cooper  
Attorneys for Plaintiff Paul A. Redd, Jr.

Dated: November 24, 2014

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IT IS ORDERED that the discovery deadlines set in the October 20, 2014, Case Management and Pretrial Order for Jury Trial (ECF 234) be and hereby are continued as follows:

- IT IS FURTHER ORDERED that no other case management deadlines are otherwise affected by this order.

Dated: November \_\_, 2014

